

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

UNITED STATES OF AMERICA, CR 11-40111

Plaintiff,

vs.

RONALD GOLDBERG,

Defendant.

DEFENDANT'S MOTION
TO ACCELERATE TRIAL
BY SEVEN DAYS

Defendant Ronald Goldberg in the above-titled matter, by his attorney, Assistant Federal Public Defender Jason J. Tupman, moves the Court to advance trial by seven days. Defendant asserts the following good cause:

1. The Court's current scheduling Order sets the deadline for suppression/voluntariness motions for August 20, 2014; the plea notification deadline for September 23, 2014; and the jury trial date for October 7, 2014.
2. Defense counsel is unavailable during the current trial setting, due to previously scheduled matters that are not able to be rescheduled.
3. Assistant U.S. Attorney Connie Larson has been informed of this motion and has no objection.

WHEREAS Defendant requests the deadline for suppression/voluntariness motions be accelerated to August 13, 2014; the plea notification deadline to September 16, 2014; and the jury trial date to September 30, 2014.

Dated this 22nd day of May 2014.

Respectfully submitted,

NEIL FULTON

Federal Public Defender

By:

/s/ Jason J. Tupman

Jason J. Tupman, Assistant Federal Public Defender

Attorney for Defendant

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